

1 Jules F. Bonjour, State Bar No. 38980  
2 BONJOUR, THORMAN, BARAY & BILLINGSLEY  
24301 Southland Dr., Ste 312  
Hayward, Ca. 94545  
3 Telephone: (510) 785-8400  
Facsimile: (510) 670-0955  
4 jules@btbandb.com

FILED FOR THE

5 Attorneys for Defendant Raquel Ramirez

6  
7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION  
11

12  
13 UNITED STATES OF AMERICA,

No. CR 12-00465 DLJ

14 Plaintiff,

STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE STATUS  
HEARING FROM FEBRUARY 7, 2013 TO  
MARCH 21, 2013

15  
16 v.

17 RAQUEL RAMIREZ, et. al.,

Date: February 7, 2013

Time: 9:00 a.m.

18 Defendants.

Court: Hon. D. Lowell Jensen

19 \_\_\_\_\_ /  
20 The defendant's are scheduled to appear before this Court on February 7, 2013 at 9:00  
21 a.m. for status hearing. The defendants request the continuance to give them more time to  
22 effectively prepare their case. AUSA Dan Kaleba joins in the request.  
23

24 The AUSA and the parties jointly request to appear before this Court on March 21, 2013  
25 at 9:00 a.m. for a further status hearing. The parties also jointly request that time be excluded  
26  
27  
28

under the Speedy Trial Act for adequate preparation and continuity of counsel. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

SO STIPULATED.

Dated: January 4, 2013

Respectfully submitted,

\_\_\_\_\_/S/\_\_\_\_\_  
Jules F. Bonjour  
Attorney for Raquel Ramirez

Dated: January 4, 2013

/s/ \_\_\_\_\_  
Kenneth W. Robinson  
Attorney for Muhammad O. Safadi

Dated: January 4, 2013

/s/ by JBS  
Paul B. Meltzer  
Attorney for Scott G. Safadi

Dated: January 4, 2013

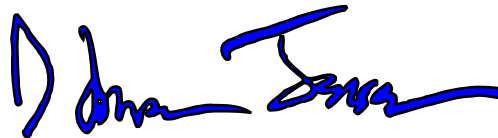
\_\_\_\_\_/S/\_\_\_\_\_  
Daniel R. Kaleba  
Assistant United States Attorney

Based upon the representation of counsel and for good case shown, the Court grants the requested continuance and finds that failing to exclude the time between February 7, 2013 and March 21, 2013 would unreasonably deny the defendants continuity of counsel and would deny counsel the reasonable and time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between February 7, 2013 and March 21, 2013 from

1 computation under the Speedy Trial Act outweigh the best interests of the public and the  
2 defendant in a Speedy trial. Therefore, IT IS HEREBY ORDERED that the time between  
3 February 7, 2013 and March 21, 2013 shall be excluded from computation under the Speedy  
4 Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).  
5

6 IT IS SO ORDERED.  
7

8  
9 Dated: GDH



HON. D. LOWELL JENSEN  
United States District Judge